## **REMARKS/ARGUMENTS**

Reconsideration of this application is respectfully requested.

In response to the formality objections to the specification, Abstract and/or claims, all of these items have been amended above – and amendments have also been effected to the drawings so as to put all of the application components into more traditional US format and style.

Accordingly, all outstanding formal issues are now believed to have been resolved in the applicant's favor.

The rejection of claims 1-12 under 35 U.S.C. §102 as allegedly anticipated by Boebert et al. '718 is respectfully traversed.

All claims 1-12 are directed to a computer/network interface device and/or to a method of operating a computer/network interface device. Accordingly, the various interfaces and other structures and/or process steps recited in applicant's claims must occur in the interface device. As explained repeatedly throughout the specification, the applicant's computer/network interface device, by being self-contained and trusted, completely avoids interfaces with a host operating system that might otherwise compromise security.

Boebert '718 is directed to a secure computer <u>network</u> with trusted path subsystems. However, it will be noted that the trusted subsystems 30, 67 do not interface directly with the network. For example, reference to Figure 2 and the associated text reveals that the trusted subsystem 30 interfaces with network 50 via "workstation processing unit 40".

Accordingly, if there is to be any computer/network interface device or operations analogous to applicant's claimed invention, they would have to reside within the workstation processing unit 40 at the interface with network 50. However, no such computer/network interface device is ever actually described in Boebert '718.

The Examiner's comments with respect to claim 1 allege that Boebert '718 teaches a "first interface for receiving data from a first zone and a first zone data format".

However, the Examiner referred only generally to the "workstation processing unit 40" and the associated description at column 4, lines 10-42 and column 5, lines 1-9.

The only "interface" therein described is, however, <u>not</u> located between the workstation 40 and the network 50. Accordingly, the Boebert '718 teaching is essentially irrelevant with respect to applicant's actually claimed invention.

If one tries to examine the allegations in the Office Action in detail with respect to other claims, such examination also reveals the basic irrelevance of Boebert '718.

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As already noted, the Examiner's grounds of rejection are unclear in that exactly which part of the Boebert reference equates to the claimed interface device is not really specified. It seems possible that the Examiner considers the "interface device" in the claim to correspond to Boebert's interface between the <u>user</u> of the workstation and the trusted subsystem 87 of the Multilevel Secure Computer, e.g., the "interface device" the Examiner is thinking of must include the cryptographic entity on the Multilevel Secure Computer ("MSC") because of the reason the Examiner gives for claim 2 allegedly being anticipated. Of course this effectively ignores the interface between workstation 40 and network 50 insofar as workstation 40 might itself not be trusted in all particulars.

Thus, the Examiner appears to be equating the keyboard 20, say, with the claimed "first zone", and the trusted subsystem 67 in the MSC as the "second zone" (or viceversa), with one or both of the cryptographic entities 35 and 69 being the "means for [cryptographic] processing".

The Examiner alleges that claim 2 lacks novelty because the workstation-based trusted path subsystem 30 encrypts data prior to sending it through the workstation and over the network 50 to the trusted subsystem 67 in the MSC, where the data is decrypted. Of course this merely <u>assumes</u> that the interface between workstation 40 and network 50 is trusted and secure – but there is no structure or process described for insuring that to be the case. Furthermore, to show anticipation of claim 3 requires something more than just

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having the same thing going in the other direction. To show anticipation of claim 3, the Examiner needs to cite a data format conversion step in <u>addition</u> to that seen in claim 2.

Claim 4 also is not anticipated because any packetization in Boebert will only occur at the interfaces with network 50. Neither the keyboard 20, nor the trusted subsystem 67 (the two candidate features corresponding to the "first zone") uses packetized data. There is nothing in the passage cited by the Examiner referring to packets or packetization. Similar comments apply to claims 5 and 7.

The Examiner's attention is also drawn to new claims 13-23. These claims are analogous in some respects to original claims 1-5 and 7-12 respectively – albeit recitations in these new claims are set forth in somewhat more concrete terminology that may be easier to understand in particular circumstances.

Accordingly, this entire application is now believed to be in allowable condition and a formal Notice to that effect is respectfully solicited.

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Respectfully submitted,

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